

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

ESTATE OF ALVIN COLE, et al.,

Plaintiffs,

v.

Case No. 22-CV-856

JOSEPH ANTHONY MENSAH

Defendant.

PLAINTIFFS' PROPOSED VOIR DIRE

In addition to this Court's standard voir dire questions, Plaintiffs submit the following proposed voir dire questions for use in jury selection.

Background Questions

1. Do you have any children who are employed? What do they do?
2. Why did you have children?
3. What do your children mean to you?
4. How have your kids impacted your life?
5. What types of activities do you enjoy with children?
6. Has any juror lost a child or loved one?
7. Have you ever worked for the City of Wauwatosa?
 - o If so, what was your title?
 - o Which department?
 - o When did you work for the City?
8. Do you have any family or friends who ever worked for the City of Wauwatosa?
 - o If so, what was their title?

- Which department?
- When did they work for the City?

9. Have you, your relatives or any close friends ever worked as a government employee? In what capacity?
10. What kind of volunteer work or community involvement are you part of?
11. Who believes that Plaintiffs in a lawsuit are generally greedy or only out for money?
12. Do you generally believe statements made by a law enforcement officer more than a non-law enforcement person?
13. Do you believe that law enforcement officers are more credible than non-law enforcement officers? Why or why not?
14. Is anyone a member of the NRA or other gun rights organizations?
15. Is there any reason, whether it be a bias or something else, that would interfere with your ability to be fair in reaching a verdict?
16. Do you believe that you may have known something about this case before you came to this courtroom?
17. Have you ever been a party in a lawsuit? Or a witness in a lawsuit?
18. This trial is expected to last for five days. Is there anything about the length or scheduling of trial that would interfere with your ability to serve on the jury?
19. Do you have a health matter that would be harmed by service on the jury, or that would interfere with your ability to be here every day and serve as a juror?
20. Do you take medication that would make it difficult to concentrate or otherwise be attentive during the proceedings or during deliberations?
21. If you are required by a doctor to avoid stressful situations, will the trial, or the give and take of the discussions during jury deliberations, be too stressful for you?
22. Do you have any medical, personal or financial problem that would prevent you from serving on this jury?
23. Have you, a family member or a close friend ever been the victim of a crime?
24. Have you or any friends or family members ever worked for a law-enforcement agency or as a law-enforcement officer?
25. To what extent have you had interactions with law enforcement in your life other

than a speeding or moving violation ticket? When was the last time you did so?

26. Have you ever been arrested or stopped by law enforcement?
27. Have you ever spent time in jail or prison? If so where and for what?
28. Have you or any friends/family members ever have any interaction with any Police Departments? Please describe it in detail?
29. Do you think law-enforcement officers have adequate discretion, not enough discretion, or too much discretion in their conduct?
30. Have you formed an opinion about police that would prevent you from being a fair juror?
31. Are any of your family members or close friend attorneys? If so, what area of law do they practice?
32. Do they share details about their work with you?
33. Do you hold any strong opinions or beliefs about lawyers?
34. Do you believe that a person whose rights have been violated is entitled to compensation?
35. Do you believe that a criminal suspect has constitutional rights?
36. Do you believe that individuals should ever be liable for punitive damages—i.e., damages meant to deter and punish a party from similar conduct in the future?
37. Would you have a problem awarding damages against the Defendant if the evidence proved that it was warranted?

Respectfully submitted this 10th day of February 2025.

CADE LAW GROUP LLC

By: /s/ Annalisa Pusick

Nathaniel Cade, Jr. SBN: 1028115

Annalisa Pusick SBN: 1116379

P.O. Box 170887

Milwaukee, WI 53217

(414) 255-3802 (phone)

(414) 255-3804 (fax)

nate@cade-law.com

annalisa@cade-law.com

MOTLEY LEGAL SERVICES

Kimberly Motley, Wis. Bar No: 1047193
2206 Bonnie Butler Way
Charlotte, North Carolina 28270
(704) 763-5413 (phone)
kmotley@motleylegal.com